

Margaret McIntyre
Attorney at Law
195 Montague Street, 14th Floor
Brooklyn, New York 11201
Tel. (212) 227-9987
Fax (917) 809-6704
mem596@icloud.com
www.margaretmcintyrelaw.com

June 7, 2022

By ECF

Hon. Hector Gonzalez
United States District Judge
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Nai He Li v. Moon Mode Design Fashion, Inc.
1:22 Civ. 793 (ARR)(SJB)

Dear Judge Gonzalez:

I, along with Brian “Geno” Nettle, of Nettle Law, represent Nai He Li, Plaintiff in the above-referenced lawsuit. On Friday, June 3, 2022, I filed a request for a Certificate of Default. ECF Docket No. 13. With this letter, Plaintiff seeks to withdraw that request so that Plaintiff may amend the Complaint.

Plaintiff hereby moves, pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure, for the Court’s leave to amend the Complaint, because Plaintiff has learned the actual identity of the Defendant named as “Jane Doe 1.” A copy of the proposed Amended Complaint, substituting that Defendant’s actual name, is annexed as an exhibit to this letter.

All Defendants in the action have been served, but no defendant has yet appeared or filed an answer. This amendment is necessary at this time because if a default judgment ultimately must be entered, it is preferable to have the default entered against that Defendant in her actual name.

Thank you for your consideration of this request.

Respectfully submitted,

/s/ Margaret McIntyre

Margaret McIntyre